



STATE OF WASHINGTON
OFFICE OF THE STATE HUMAN RESOURCES DIRECTOR

DIRECTOR'S REVIEW PROGRAM
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May 30, 2012

TO: Teresa Parsons, SPHR
Director's Review Program Supervisor

FROM: Kris Brophy, SPHR
Director's Review Program Investigator

SUBJECT: Edith Rozmaryn v. Department of Corrections (DOC)
Allocation Review Request ALLO-11-115

This position review was based on the work performed for the twelve-month period prior to April 27, 2011, the date the Stafford Creek Corrections Center (SCCC) HR office received Ms. Rozmaryn's request for a position review. As the Director's Review Investigator, I carefully considered all of the documentation in the file, the exhibits, and the verbal comments provided by both parties during the review telephone conference. Based on my review and analysis of Ms. Rozmaryn's assigned duties and responsibilities, I conclude her position is properly allocated to the Electronics Technician classification.

Background

On April 27, 2011, Stafford Creek Correctional Center Human Resources (SCCC-HR) received Ms. Rozmaryn's Position Review Request (PRR) form, requesting that her Electronics Technician position be reallocated to the Electronics Technician 4 classification (Exhibit B-1).

By memorandum dated November 3, 2011, DOC HR notified Ms. Rozmaryn that her position was properly allocated to the Electronics Technician classification (Exhibit B-5).

On November 30, 2011, the Office of State Human Resources Director received Ms. Rozmaryn's letter appealing DOC's allocation determination (Exhibit A-1).

I conducted a Director's review telephone conference with the parties on May 2, 2012. Present during the conference were Edith Rozmaryn and Tina Cooley, Human Resource Consultant - DOC.

Rationale for Director's Determination

The purpose of a position review is to determine which classification best describes the overall duties and responsibilities of a position. A position review is neither a measurement of the volume of work performed, nor an evaluation of the expertise with which that work is performed. A position review is a comparison of the duties and responsibilities of a particular position to the available classification specifications. This review results in a determination of the class that

best describes the overall duties and responsibilities of the position. Liddle-Stamper v. Washington State University, PAB Case No. 3722-A2 (1994).

Duties and Responsibilities

Ms. Rozmaryn installs, maintains, repairs and tests electronic communication, Simplex fire alarm, intercom, Siemens HVAC Direct Digital Control (DDC), surveillance, and other electronic systems and equipment at SCCC. The majority of Ms. Rozmaryn's time is spent performing troubleshooting, maintenance, testing and repair of electronic and low voltage electrical systems and sub-systems used in and around the SCCC facility. This includes sensors, logic relay and other controls used in facility security, alarm, closed circuit and cable television surveillance systems, fire/smoke detection and suppression systems.

Ms. Rozmaryn has primary responsibility for maintaining and repairing the fire alarm systems and the Motorola two-way radio communication system. This includes all hand-held portables, mobiles, repeater systems, UPS [Uninterrupted Power Supply], and audio recording systems.

Ms. Rozmaryn's duties and responsibilities are summarized from the PRR form as follows:

- 80% Maintain, monitor, and perform regular maintenance on all SCCC's SIMPLEX fire alarm systems facility-wide. [Perform] 24-hour maintenance and emergency services on all facility Touch Screen systems that monitor and control all facility perimeter access and egress gates, all security systems in SCCC's Intensive Management Unit and Administrative Segregation Unit.

Maintain, program, and monitor PLC systems throughout SCCC's facility which control all interior and exterior buildings and perimeter security systems.

Maintain two separate and primary electronic surveillance systems including the Digital Video Recording (DVR) system which provides continuous video recording from 120 video cameras located throughout SCCC, and the 256 security cameras with complex multiplexer monitoring systems.

IP based networked camera systems.

Maintains, monitors, and provides repairs to the internal facility Visual Media and cable TV systems serving all living units, offender program areas, and staff training areas.

Responsibility for [maintaining] the Motorola two-way radio communication system. This includes all hand-held portables, mobiles, repeater systems, UPS [Uninterrupted Power Supply], and audio recording systems.

Maintain, program, and monitor PCI systems throughout SCCC's facility which control all interior and exterior buildings and perimeter security lighting systems.

Monitor, maintain, and complete service repairs on the "Taut Wire" perimeter fence security system.

Maintain and monitor the Siemens HVAC control system including actuator damper motors, DDC controls and sensors.

- 15% Prepare preliminary cost estimates and projections for assigned task or projects. Order sufficient required materials to accomplish assigned tasks. Schedule work to be completed based upon its assigned tasks. Use current SCCC procedures to hire and train offender workers as needed. Ensure that all safety and security procedures are followed. For example, all tool and key accountability policies and procedures are adhered to.

As stated in the PDF for her position (Exhibit B-2), Ms. Rozmaryn performs a variety of shop and field testing, adjustment, troubleshooting and repair work to replace system components, integrated circuits, transistors and resistors of electronic systems, equipment and devices. She checks, adjusts, calibrates and repairs a variety of recording and indicating devices and HVAC air flow digital control equipment. She performs electronic repairs to system, board or component level, and calibrates and tests for proper operation. Ms. Rozmaryn receives her work assignments through work orders, emergency call-ins, and direct assignments from her immediate supervisor, Mr. Karl Lofgren, Electronics Supervisor.

Mr. Lofgren completed and signed the supervisor's section of the PRR. Mr. Lofgren indicated on the form that he agrees that the information contained in the PRR is accurate and complete. In his comments, Mr. Lofgren states that he has given the lead of the Fire Alarm and Radio systems to Ms. Rozmaryn. He also stated that he is "... only involved to help with problems which need assistance." Mr. Lofgren also states that Ms. Rozmaryn is authorized to resolve any problems and order replacement parts for any situations that arise.

Summary of Ms. Rozmaryn's Perspective

Ms. Rozmaryn asserts the overall complexity of her work has and will continue to increase; thereby warranting reallocation to a higher level class. Ms. Rozmaryn asserts she performs senior-level electronics technician work at SCCC, and that the overall level of responsibility and complexity of her work is consistent with the requirements of the Electronics Technician 4 class.

Ms. Rozmaryn contends her position's duties are consistent with those performed by other Electronics technician positions at other facilities including the Monroe Corrections Center (MCC), and that those positions are allocated to the higher-level ET 4 class. Ms. Rozmaryn asserts her position should be reallocated to the ET 4 class in order to be properly aligned with those positions and to provide equitable compensation across the agency.

Summary of DOC's Reasoning

DOC contends Ms. Rozmaryn's position provides journey-level electronics technician work consistent with the Electronics Technician (ET) class. DOC contends Ms. Rozmaryn's duties do not reach ET 4 level of responsibility. Ms. Cooley asserted during the conference that ET 4 - level positions at DOC correctional facilities perform higher-level work and are generally stand alone positions with sole responsibility for maintaining and repairing a particular electronics system. Ms. Cooley asserted ET 4 level work is not generally interchangeable or able to be performed by other technicians within the facility. Ms. Cooley asserts the work Ms. Rozmaryn performs at SCCC, including the fire alarm and radio systems, is interchangeable and performed by other electronics technician staff when Ms. Rozmaryn is absent or performing other duties within the facility. Therefore, DOC contends the majority of Ms. Rozmaryn's time is spent performing journey-level work as an Electronics Technician, which involves performing standard installation, maintenance, testing and repairing activities for a variety of electrical and electronic systems used in security and alarm surveillance at SCCC. DOC contends Ms. Rozmaryn's position is properly allocated to the ET class.

Class Specifications

When comparing the assignment of work and level of responsibility to the available class specifications, the class series concept (if one exists) followed by definition and distinguishing characteristics are primary considerations.

Comparison of Duties to the Electronics Technician 4 (ET4)

The Definition for this class states:

Serves as Lead or senior level technician and performs work in [the] layout, construction and installation of electronic and safety equipment. Troubleshoots, maintains, repairs and tests, analog, and/or digital electronic equipment. Delivers and installs equipment, calibrate test equipment. Assembles scientific instruments or electronic air monitoring systems. Implements and evaluates workflow priorities. Develops and disseminates instructions and information to unit personnel. [Emphasis added]

The Office of the State Human Resources Director (OSHRD) Glossary of Classification Terms defines Lead as:

An employee who performs the same or similar duties as other employees in his/her work group and has the designated responsibility to regularly assign, instruct, and check the work of those employees on an ongoing basis.

The OSHRD Glossary of Classification Terms defines Senior as:

The performance of work requiring the consistent application of advanced knowledge and requiring a skilled and experienced practitioner to function independently. Senior-level work includes devising methods and processes to resolve complex or difficult issues that have broad potential impact. These issues typically involve competing interests, multiple clients, conflicting rules or practices, a range of possible solutions, or other elements that contribute to complexity. The senior-level has full authority to plan, prioritize, and handle all duties within an assigned area of responsibility. Senior-level employees require little supervision and their work is not typically checked by others.

Ms. Rozmaryn's position does not have lead responsibility and her duties do not fully reach the requirements of this class of performing a variety complex, senior-level tasks as required. The overall thrust of Ms. Rozmaryn's position, and the majority of her duties as a whole, involves performing standard journey-level maintenance and repair tasks on electronic systems, components and equipment at the SCCC facility.

Ms. Rozmaryn does not have full authority to independently plan, prioritize, and handle all duties within her assigned area of responsibility. From the information presented, the majority of her work involves completing standard and generally recurring work assignments which come from written work orders, emergency call-ins, and assignments from her supervisor. The overall latitude to which she can independently plan and prioritize her work within her assigned area of responsibility is limited.

Ms. Rozmaryn does not spend a majority of her time performing higher-level work at the level anticipated by this class such as fabricating, assembling and testing electronic circuitry in accordance with schematics and diagrams. The majority of her work does not require devising methods and processes to resolve complex or difficult issues. She does not develop or evaluate newly-developed equipment or other types of instrumentation.

Ms. Rozmaryn stated during the review conference that Mr. Lofgren retains authority over special construction or remodeling construction projects which require electronics technician work. Ms. Rozmaryn's responsibility for consulting with professional and technical personnel on design concepts, equipment requirement(s), and feasibility of fabrication and installation during new construction or remodeling projects is limited. Ms. Cooley stated during the review conference that in 2011, SCCC had two facility projects in process. These included moving the greenhouse and completing a new furniture factory. Ms. Rozmaryn did not recall having involvement with these projects.

Ms. Rozmaryn does not develop preventative maintenance procedures, schedules and forms or develop quality assurance procedures for proposal to management.

Ms. Rozmaryn does assist and/or oversee vendor warranty repairs with regard to the fire alarm and radio systems. She does not prepare reports for management review.

Ms. Rozmaryn does maintain and operate electronic test equipment. She keeps records of work performed and supplies used and she does perform standard preventive maintenance on electronic systems and electronic test equipment. She tests, diagnoses, adjusts and calibrates to appropriate standards.

However, while Ms. Rozmaryn has a high degree of independence and latitude in completing her work, and a portion of her work reaches the requirements of this class, the majority of her duties and overall level of responsibility as a whole do not meet the ET 4 level. The ET 4 class does not address the primary focus of her position, which is to provide standard, journey-level technical support to a variety of electronic safety and security systems and radio communications equipment across the SCCC facility.

For these reasons, her position should not be reallocated to the ET 4 class.

Comparison of Duties to the Electronics Technician (ET) class

The Definition for the Electronics Technician class states:

Installs, maintains, repairs and tests electrical and electronic systems used in security and alarm surveillance and instructs personnel in the proper operation and minor maintenance of this equipment.

Further, the following Personnel Appeals Board, decision provides guidance as to the type of work performed by positions allocated to the Electronics Technician by concluding the following:

The specification for the Electronics Technician classification states that incumbents perform skilled journey level work which includes installing, maintaining, repairing and testing electrical and electronic systems used in security and alarm surveillance and instructing personnel in the proper operation

and minor maintenance of this equipment. The typical work for this class includes the installation and maintenance of internal security systems, including electronic surveillance systems, and conducting inspections and tests to ensure the security systems are functional. The typical work also includes recommending purchases of security devices, consulting with contractors, and instructing employees in the use and repair of security systems. This class specifically addresses the maintenance and repair of electrical and electronic systems used in security and alarm surveillance such as those used at Fircrest School. Hafzalla v. Dep't. of Social and Health Services, PAB No. ALLO-00-0025 (2001).

The OSHRD Glossary of Classification Terms defines Journey as, "Fully competent and qualified in all aspects of a body of work and given broad/general guidance. Individuals can complete work assignments to standard under general supervision. Also referred to as the working or fully-qualified level."

The OSHRD Glossary of Classification Terms defines General Supervision as:

- Employee performs recurring assignments without daily oversight by applying established guidelines, policies, procedures, and work methods.
- Employee prioritizes day-to-day work tasks. Supervisor provides guidance and must approve deviation from established guidelines, policies, procedures, and work methods.
- Decision-making is limited in context to the completion of work tasks. Completed work is consistent with established guidelines, policies, procedures and work methods. Supervisory guidance is provided in new or unusual situations.
- Work is periodically reviewed for compliance with guidelines, policies and procedures.

The primary focus of Ms. Rozmaryn's position falls within the scope of the Definition of the Electronics Technician class. As a whole, her position performs a variety of standard journey-level work installing, maintaining, repairing and testing electrical and electronic systems used in security and alarm surveillance.

Ms. Rozmaryn works under general supervision and completes a majority of generally recurring assignments without daily oversight of her supervisor. She applies established guidelines, policies, procedures, and work methods to complete her tasks. Ms. Rozmaryn prioritizes her day-to-day work tasks and follows established guidelines, policies, and procedures to complete her work. Mr. Lofgren stated in the PDF that he provides assistance and guidance for unusual situations that occur.

Although the typical work examples do not form the basis for an allocation, they do lend support to the work envisioned within the classification.

The following examples of typical work align with the duties performed by Ms. Rozmaryn in her position:

- Installs and maintains internal security systems to include electronic surveillance and instructs personnel in the proper operation and minor maintenance of this equipment.

- Conducts frequent inspections and tests to ensure that the security systems are functional and adequate;
- Recommends the selection, installation, and maintenance of security devices
- Instructs Electricians or Electrician Supervisors in the maintenance of security devices;
- Services and repairs communication radio equipment, makes frequency checks to ensure the stations are on frequency and within modulation limits;
- Tests and evaluates new electronic equipment and makes site inspections;
- Supervises purchases of all parts and materials, maintenance of adequate stocks of maintenance parts and supplies, and supervises inventory of equipment, parts, and supplies.

Ms. Rozmaryn's duties are consistent with these statements. She performs skilled journey-level work installing, maintaining, repairing and testing electrical and electronic systems used in security and alarm surveillance. She installs and maintains internal security and surveillance systems and conducts inspections and runs tests to ensure security systems are functional. This includes all of SCCC's SIMPLEX fire alarm systems facility-wide. She performs 24-hour maintenance and emergency services on all facility Touch Screen systems.

Ms. Rozmaryn maintains and monitors PLC systems throughout SCCC's facility, and the electronic surveillance systems including the Digital Video Recording (DVR) system and 256 security cameras. Ms. Rozmaryn stated during the conference that she maintains, monitors, and provides repairs to the component level for the cable TV systems.

Ms. Rozmaryn provides back-up support to her co-worker with regard to the maintenance of the HVAC and Taut Wire alarm systems and equipment.

She also provides primary support to the fire alarm and radio communications systems. Ms. Rozmaryn contacts the vendors for proprietary maintenance or repairs as needed.

Part of Ms. Rozmaryn's argument has been the allocation of similar positions at other correctional facilities. However, the PRB, has previously determined that although a comparison of one position to another similar position may be useful in gaining a better understanding of the duties performed by and the level of responsibility assigned to an incumbent, allocation of a position must be based on the overall duties and responsibilities assigned to an individual position compared to the existing classifications. The allocation or misallocation of a similar position is not a determining factor in the appropriate allocation of a position. Byrnes v. Dept. of Corrections, PRB No. R-ALLO-06-005 (2006) citing Flahaut v. Dept's of Personnel and Labor and Industries, PAB No. ALLO 96-0009 (1996).

Additionally, most positions within the civil service system occasionally perform duties that appear in more than one classification. However, when determining the appropriate classification for a specific position, the duties and responsibilities of that position must be considered in their entirety and the position must be allocated to the classification that provides the best fit overall for the majority of the position's duties and responsibilities. Dudley v. Dept. of Labor and Industries, PRB Case No. R-ALLO-07-007 (2007).

Finally, positions are to be allocated to the class which best describes the majority of the work assignment. Ramos v. DOP, PAB Case No. A85-18 (1985).

During the review conference Ms. Colley stated that Ms. Rozmaryn is a highly-valued employee and her work is greatly appreciated. However, a position's allocation is not a reflection of performance or an individual's ability to perform higher-level work. Rather, a position's allocation is based on the majority of work assigned to a position and how that work best aligns with the available job classifications. Based on the overall level, scope and diversity of the duties and responsibilities assigned to Ms. Rozmaryn's position, her position is properly allocated to the ET classification.

Appeal Rights

RCW 41.06.170 governs the right to appeal. RCW 41.06.170(4) provides, in relevant part, the following:

An employee incumbent in a position at the time of its allocation or reallocation, or the agency utilizing the position, may appeal the allocation or reallocation to . . . the Washington personnel resources board Notice of such appeal must be filed in writing within thirty days of the action from which appeal is taken.

The mailing address for the Personnel Resources Board (PRB) is P.O. Box 40911, Olympia, Washington, 98504-0911.

You may file in person at 521 Capitol Way South, Olympia, Washington. Fax number (360) 586-4694. For questions, please call (360) 664-0388.

If no further action is taken, the Director's determination becomes final.

c: Edith Rozmaryn
Tina Cooley, DOC
Lisa Skriletz, OSHRD

Enclosure: List of Exhibits

EDITH ROZMARYN v DOC (ALLO-11-115)

List of Exhibits

A. Edith Rozmaryn Exhibits

1. Letter requesting Director's review, signed by Edith Rozmaryn and Mark Kepler, received by Director's Review Program on November 30, 2011
2. April 1, 2011 email from Mark Kepler to Michael Tupper requesting desk audit for Mr. Kepler and Ms. Rozmaryn
3. July 13, 2011 email from Tina Cooley to Mr. Kepler and Ms. Rozmaryn regarding desk audit notes
4. Copy of DOC allocation determination letter from Tina Cooley to Edith Rozmaryn dated November 3, 2011

B. DOC Exhibits

1. Position Review Request form (PRR) for Edith Rozmaryn, received by SCCC Human Resources on April 27, 2011
2. Position Description Form (PDF) for Edith Rozmaryn, received by SCCC Human Resources on April 27, 2011
3. PDF for Edith Rozmaryn's position dated December 12, 2006
4. SCCC Engineering department Organizational chart dated March 29, 2010
5. DOC allocation determination letter from Tina Cooley to Edith Rozmaryn dated November 3, 2011

C. Class Specifications

1. DOP Class Specification for Electronics Technician (592W)
2. DOP Class Specification for Electronics Technician 4 (592M)